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7 **ATTORNEY FOR:** Petitioner Zhu, Lian Kun

8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE**
10 **NORTHERN MARIANA ISLANDS**

11 **ZHU, LIAN KUN,**

12 Petitioner,

13 v.

14 **UNITED STATES OF AMERICA,**

15 Respondent.

CIVIL CASE NO. 08-0012

CRIMINAL CASE NO. 03-00018

**DECLARATION OF ZHU
LIAN KUN IN SUPPORT OF
PETITION TO VACATE, SET
ASIDE, OR CORRECT
SENTENCE**

**PURSUANT TO 28 U.S.C.
§ 2255**

16 COMES NOW, ZHU, LIAN KUN, and states the following:

17 1. I am the Petitioner in the above entitled matter.

18 2. I am over the age of majority and competent to testify to the matters stated herein, if

1 necessary.

2 3. During the course of my trial in Criminal Case 03-00018 a person by the name of
3 Zhu, Han Liang reported to me that he observed the prosecutor making hand signals to two of the
4 witnesses in my trial.

5 4. Although Mr. Zhu, Han Liang has the same last name as me, we are not related.

6 5. I am informed and believe that Mr. Zhu, Huang Lian is no longer on Saipan and has
7 returned to China.
8

9 6. The only contact information which I have for Mr. Zhu, Han Liang is his cell phone
10 number in China. That number is 011 136-519-77175.

11 7. Mr. Zhu, Han Liang reported to me and my former attorney that the two witnesses
12 who were being signaled by the prosecutor during my trial were Agent Ray M. Renguul and Jiang,
13 Li Xia
14

15 8. This information was reported to my attorney Mr. F. Mathew Smith by Mr. Zhu,
16 Han Liang, in my presence during a recess in the trial.

17 9. Mr. F. Mathew Smith informed me that he discussed this matter with the prosecutor
18 but that the prosecutor denied making any such signals.
19

20 10. Mr. F. Mathew Smith never informed the judge about these incidents of signaling
21 between the prosecutor and these witnesses.

22 I declare under penalty of perjury under the laws of the United States that the foregoing is
23

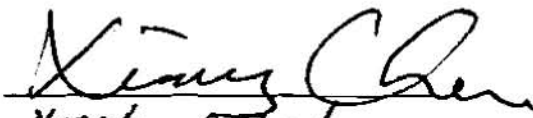
1 true and correct and that this declaration was executed in the Moshanon Federal Detention Facility,
2 in the State of Pennsylvania on this 15 day of April, 2008.

3
4 
5 ZHU, LIAN KUN, Declarant

6
7 CERTIFICATE OF TRANSLATION

8
9 I, XIANG CHEN, hereby certify that I am competent to translate from
10 English to Chinese and vice versa. I have translated the contents of the above declaration
11 from English to Chinese and Mr. Zhu, Lian Kun told me that he understood the statements
12 made in the Declaration before he signed this document.

13
14 Date: April 15 / 08

15 
16 XIANG CHEN
(Signature and printed name of translator)